

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 24, 2020

By ECF

Hon. Paul A. Crotty
Judge, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

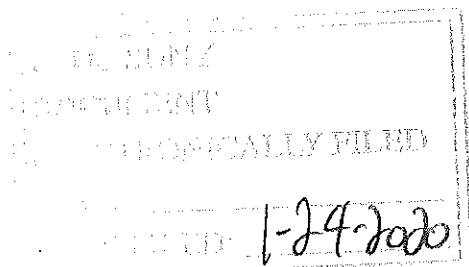
Dear Judge Crotty,

During the final pretrial conference today, in response to the defendant's request for Mr. Schulte's personnel file, the government informed the court that it had produced the file to the defense. As ordered by the Court, the government informed the defense by electronic mail that its production of the personnel file consisted of documents stamped JAS 014461-620 and the information located in the government's letter to the defense dated February, 12, 2020. A review of the documents in this bates range does not comport with what a personnel file would normally contain. Additionally, production of the PARs is simply a subset of a personnel file. To simply matters, we ask the Court to order the government to simply confirm that they have provided to the defense the entirety of the Mr. Schulte's personnel file as they received it from the CIA.

Finally, we renew our request for the personnel file for the co-worker who had a work related dispute with Mr. Schulte. The government and the CISO have forbidden us to investigate CIA employees; one cannot investigate a case involving CIA employees without attributing the name to an agency. As a result, the personnel files take on an importance not encountered in other criminal cases.

Respectfully submitted,

/s/Sabrina Shroff & Edward Zas
Attorneys for Joshua A. Schulte



1/24/2020
The government is directed to confirm that Schulte's personnel file has been produced. Further the govt is directed to produce the personnel file of the co-worker Schulte has a dispute with to the extent that it refers to the dispute with Schulte.
No follow up
1/24/2020